



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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CRH/MAA/IC  
F. #2017R00906

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 24, 2023

By ECF and Email

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. McMahon, et al.  
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government respectfully submits this letter to request a courtroom accommodation for the upcoming trial, scheduled to begin on May 31, 2023, given highly sensitive victim information that will be presented during trial.

Specifically, the government requests that the trial be held in a courtroom with additional monitors in the jury box, to facilitate the jurors' review of exhibits. Counsel for defendants Michael McMahon and Congying Zheng have advised that they join this request, and counsel for defendant Zhu Yong has advised that he does not oppose the request. For the reasons set forth in the government's motion in limine, the government seeks to limit public disclosure of personal information of the victims and their family members. (See Dkt. Nos. 195 at 47-50, 196 at 47-50.) Accordingly, the government anticipates seeking leave to publish numerous exhibits containing highly sensitive victim information (e.g., social security numbers, passport numbers, phone numbers, addresses) to the jury but not the gallery; the sensitive personal information is relevant to the charged conduct and cannot be redacted before publishing to the jury. Holding the trial in a courtroom with additional monitors in the jury box, and specifically, monitors in the second and third rows, will significantly improve the jurors' ability to review the exhibits. The government further notes that this is a case with voluminous written exhibits (e.g., written communications, documents, photographs) and audio and video recordings (e.g., recorded conversations) – including surveillance video that the jurors will need to review carefully – such

that the jury more generally will be considerably aided by access to additional monitors and enhanced audio capabilities.

Respectfully submitted,

BREON PEACE  
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CC: Defense Counsel (by ECF)